

TANNEN LAW GROUP, P.C.
77 W. Washington St, Suite 500
Chicago, IL 60602
Telephone: (312) 641-6650
Michael Murphy Tannen, Esq.
Attorneys for Diana Arney

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

)
)
) Chapter 11
)
) Case No. 18-23538
) (RDD)
) (Jointly Administered)
)
)

AFFIDAVIT OF DEBORAH MADDOX

Deborah Maddox, being duly sworn under oath, hereby avers and states as follows:

1. I have personal knowledge of the facts contained in this affidavit and could competently testify thereto if called as a witness. I am above the age of 18. I am one of Plaintiff Diana Arney's daughters.

2. On or around November 28, 2008 ("Black Friday 2008"), I traveled with my husband, Adam Henkels ("Adam"), to the Sears department store previously located at 4730 Irving Park Road, Chicago, IL 60641 (referred to hereafter as "the Sears at Six Corners"). We arrived at the Sears at Six Corners near closing time as we had been running errands all day.

3. I traveled to the Sears at Six Corners on or around Black Friday 2008 intending to browse and potentially purchase a residential clothes dryer available for sale by Sears.

4. On or around Black Friday 2008, I was shopping for a new residential clothes dryer to be installed and used in the home then owned by my mother, Diana Arney at 325 W. Joe Orr Road, in Chicago Heights, Illinois.

5. In November 2008, my sister Angela Arney, and Diana Arney's mother and my grandmother, Lola Talamonti, also lived at 325 W. Joe Orr Road.

6. While at the Sears at Six Corners on or around Black Friday 2008, Adam and I browsed the residential clothes dryers on display in the home appliance section of the Sears at Six Corners. The dryer which appealed to us most was a Kenmore brand clothes dryer with model no. 41798042700 (hereafter called "the Kenmore Dryer"). We met with an employee of Sears in the appliance section. We tried to call my sister and grandmother from the sales display floor at the Sears at Six Corners to apprise them of the type of dryer we had found. We were unable to reach them while we were at the Sears at Six Corners. We therefore asked the Sears sales representative whether he could put a hold on the dryer of our choice.

7. Thereafter, Adam and I left the Sears at Six Corners. Having seen the Kenmore Dryer, we then called my sister Angela Arney and grandmother Lola Talamonti from our car. We described the Kenmore Dryer we liked. We told my sister and grandmother that the Kenmore Dryer was part of a Black Friday sales promotion. My grandmother Lola Talamonti provided us with her credit card information. Thereafter, we called Sears from our car and ordered the Kenmore Dryer over the phone. We paid for the Kenmore Dryer with my grandmother's credit card. We did direct the Sears sales phone representative to have the Kenmore Dryer delivered to my mother's home in Chicago Heights.


8. I have made a diligent search for my grandmother Lola Talamonti's credit card records from 2008 which reflect payment for the Kenmore Dryer. I have learned/been advised that the credit card processing company Elan maintains records of credit card transactions for seven years. Accordingly, those records are not available.

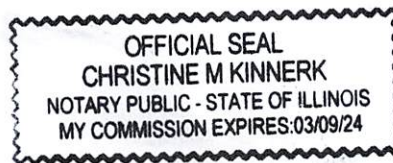
9. Based on the foregoing, my mother Diana Arney did not choose the Kenmore Dryer and she did not pay for the Kenmore Dryer which was subsequently installed in her home.

FURTHER AFFIANT SAYETH NAUGHT


Deborah Maddox

Subscribed and sworn to me before this
5th day of January.


Notary Public



Prepared by:
Michael M. Tannen
mtannen@tannenlaw.com
Timothy R. Meloy
tmeloy@tannenlaw.com
Tannen Law Group, P.C.
77 W. Washington Street, Suite 500
Chicago, IL 60602 / 312.641.6650

TANNEN LAW GROUP, P.C.
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Michael Murphy Tannen, Esq.

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VERIFICATION

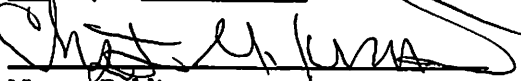
Pursuant to 28 U.S.C. § 1746 and under penalties of perjury, I, Deborah Maddox, certify that I have personal knowledge of the facts and the statements as set forth in this Affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that I verily believe the same to be true.


Deborah Maddox

Prepared by:
Michael M. Tannen
mtannen@tannenlaw.com
Timothy R. Maloy
tmaloy@tannenlaw.com
Tannen Law Group, P.C.
77 W. Washington Street, Suite 500
Chicago, IL 60602 / 312.641.6630

Subscribed and sworn to me before this

5th day of January, 2022


Notary Public

OFFICIAL SEAL
CHRISTINE M KINNERK
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES 03/08/24